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ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
JEFFREY LEE PALMER, and
TANNA LEE MEAGHER,
Defendants.

CR 15-32-M-DWM-02
CR 15-32-M-DWM-04

OFFER OF PROOF

THE CHARGE

The Defendants, Jeffrey Lee Palmer and Tanna Lee Meagher, are charged in the Superseding Information with misprision of a felony in violation of 18 U.S.C. § 4.

PLEA AGREEMENT

There are plea agreements to be filed in this case. The United States did present any and all formal plea offers to the defendant in writing. *See Missouri v. Frye*, 132 S. Ct. 1399 (2012).

PENALTIES

Each defendant is subject to a maximum penalty of three years imprisonment, \$250,000 fine, one year supervised release, and a \$100 special assessment.

ELEMENTS

In order for each defendant to be found guilty of the charge in the Superseding Information, the United States must prove each of the following elements beyond a reasonable doubt:

- First, a federal felony was committed by someone;
- Second, the Defendant had knowledge of the commission of that felony;
- Third, the Defendant failed to notify an authority as soon as possible; and
- Fourth, the Defendant did an affirmative act, as charged, to conceal the crime.

An “authority” includes a federal judge or some other federal civil or

military authority, such as a federal grand jury, Secret Service or FBI agent. In this case an “authority” also could have been the US Postal Inspector, the Bureau of Alcohol, Tobacco, Firearms and Explosives, or the Department of Homeland Security.

ANTICIPATED EVIDENCE

If this case was tried in United States District Court, the United States would present the following evidence:

1. Jeffrey Lee Palmer and Eric Daniel Doyle were friends. Tanna Lee Meagher and Eric Daniel Doyle were friends. All lived in the Kalispell, Montana area for most of 2014.
2. Doyle came up with a plan to make money by using the internet to sell firearms to people who lived in other countries. Doyle used the United States Postal Service to ship the firearms out of the United States. He used Palmer and Meagher, and others, to mail those packages from various United States Post Offices in Northwestern Montana. Those post offices were located in Lakeside, Missoula, Whitefish, and Browning, Montana. The mailings occurred February through August 2014.
3. Knowing what Doyle was doing – selling and shipping firearms to people in other countries using the USPS, Palmer also obliterated

serial numbers off of a couple of firearms before Doyle packaged them for shipment.

4. Knowing what Doyle was doing – selling and shipping firearms to people in other countries using the USPS, Meagher allowed Doyle to use her residence to assemble some packages containing firearms for shipment. Meagher also made a false statement during a firearms transaction for Doyle before he shipped the firearms to people in other countries.
5. Neither Palmer nor Meagher told the authorities in this case about Doyle's illegal plan or acts until they were confronted by the Bureau of Alcohol, Tobacco, Firearms and Explosives and the US Postal Inspector in this case – August 27, 2014, for Palmer; and October 17, 2014, for Meagher.

Respectfully submitted this 29th day of January, 2016.

MICHAEL W. COTTER
United States Attorney

/s/ Paulette L. Stewart
Assistant U.S. Attorney
Attorney for Plaintiff